

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Docket No. 1:18-cr-10307-MLW
DAREN DEJONG	)	
	)	
Defendant.	)	
	)	

**THIRD SUPPLEMENTAL MEMORANDUM  
IN AID OF SENTENCING**

Defendant Daren DeJong (“DeJong”), by and through undersigned counsel, respectfully requests this Honorable Court consider the following additional information he believes to be relevant to comparative sentence(s) for similarly situated defendants, which was not available at the time of the deadline for any/all supplemental filings.<sup>1</sup>

Specifically, the defendant asks that this Honorable Court also consider the sentence imposed on former Troop E Lieutenant David Wilson (“Wilson”) in Suffolk County Superior Court yesterday. According to news reports, Wilson, who had previously received a sentence of one (1) day “deemed served,” followed by one (1) year supervised release, after pleading guilty in the parallel federal investigation, was sentenced to two (2) years Probation and two hundred (200) hours community service after pleading guilty to state charges alleging he fraudulently collected more than \$31,000 in overtime pay for hours he didn’t work in 2015 and 2016.<sup>2</sup>

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<sup>1</sup> On January 17, 2020, this Court set a final deadline for filing of supplemental materials of January 27, 2020 (see docket entry no. 77).

<sup>2</sup> According to the Boston Globe article related to the same (January 30, 2020), Wilson “is among 46 troopers and supervisors investigated in a payroll fraud scheme... 10 have been charged criminally [including Dejong], nine of whom have pleaded guilty.”

Dated: January 30, 2020

Respectfully submitted,  
DAREN DEJONG  
By and through his attorneys,

/s/ R. Bradford Bailey  
R. Bradford Bailey, BBO#549749  
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**Certificate of Service**

I, R. Bradford Bailey, hereby certify that on this the 30<sup>th</sup> day of January 2020, I caused a true copy of the foregoing motion to be served upon all necessary parties to this matter by virtue of electronically filing the same via the CM/ECF system.

/s/ R. Bradford Bailey  
R. Bradford Bailey, Esq.